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Attorneys for Defendant

TODD SHIPYARDS CORPORATION

BEFORE THE JUDICIAL PANEL ON MULTI-DISTRICT LITIGATION

11 IN RE: ASBESTOS PRODUCTS LIABILITY) MDL DOCKET NO. 875
12 LITIGATION (NO. VI),)
13 This Document Relates to:)
14 SHIRLEY CRONIN et al. vs.)
TODD SHIPYARDS CORPORATION, et al.)

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

18 SHIRLEY CRONIN, et al.,) CASE NO. CV 08-3274
19 Plaintiffs,)
20 vs.) DEFENDANT TODD SHIPYARDS
CORPORATION'S NOTICE OF TAG-
21 TODD SHIPYARDS CORPORATION,) ALONG ACTION
GENERAL DYNAMICS CORPORATION,) Multi-District Rule 7.5(e)
22 VIAD CORP., and HAYLEY HOTT,)
23 Defendants.)

TO THE CLERK OF THE ABOVE-ENTITLED COURT, AND TO ALL PARTIES AND
THEIR ATTORNEYS OF RECORD:

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PLEASE TAKE NOTICE THAT on July 29, 1991, the Judicial Panel of Multi-District Litigation entered an order transferring all asbestos cases pending in the federal courts to the United States District Court, Eastern District of Pennsylvania, for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C. §1207 ("MDL Transfer Order"). The MDL Transfer Order also applies to "tag-along actions," which refers to a civil action pending in a District Court and involving common questions of fact with actions previously transferred under Section 1407 by the Judicial Panel of Multi-District Litigation pursuant to a January 17, 1991 Order to Show Cause. See Multi-District Litigation Rules ("MDL Rules"), Rule 11.

Pursuant to MDL Rule 7.5(c),

Any party or counsel in actions previously transferred under Section 1407 or under consideration by the Panel for transfer under Section 1407 shall notify the Clerk of the Panel of any potential "tag-along actions" in which that party is also named or in which that counsel appears.

Defendant Todd Shipyards Corporation hereby notifies the Court that the above-entitled action involves all or a material part of the same subject matter as another action which is pending in another federal court. Accordingly, the above-entitled action is considered a "tag-along action," subject to transfer to the United States District Court for the Eastern District of Pennsylvania, because the action involves alleged injuries due to exposure to asbestos. The Clerk of the Panel may either (1) enter a conditional transfer pursuant to MDL Rule 7.4(a) or (2) file an order to show cause why this action should not be transferred pursuant to MDL Rule 7.5(b).

DATED: August 4, 2008

YARON & ASSOCIATES

By: 

GEORGE D. YARON
KEITH E. PATTERSON
JOSHUA D. WHITE
Attorneys for Defendant
TODD SHIPYARDS CORPORATION

PROOF OF SERVICE

I am over 18 years of age and not a party to the within action. I am employed in the County of San Francisco; my business address is Yaron & Associates, 601 California St., 21st Floor, San Francisco, California 94108-2826.

On **August 4, 2008**, I served the within:

DEFENDANT TODD SHIPYARDS CORPORATION'S NOTICE OF TAG-ALONG ACTION

on all parties in this action as listed by ECF

☒ **VIA ELECTRONIC SERVICE:** I served a true copy, with all exhibits, electronically on designated recipients through PACER. Upon completion of electronic transmission of said document(s), a receipt is issued to serving party acknowledging receipt by PACER's system. Once PACER has served all designated recipients, proof of electronic service is returned to the filing party which will be maintained with the original document(s) in our office. This service complies with CCP §101.6.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this declaration was executed on **August 4, 2008**, at San Francisco, California.



MARISELA H. NAVARRO